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January 28, 2025

Via ECF

The Honorable Judith C. McCarthy United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Justine Ying
Case No.: 7:22-mj-03841-UA-4

Dear Judge McCarthy:

The undersigned has been appointed to represent Ms. Justine Ying in the above-captioned matter. The defendant, Justine Ying, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Ying seeks an Order from the Court to permit her to travel to visit a friend in Hyde Park, Massachusetts, from February 20, 2025 through February 25, 2025.

In order to facilitate the defendant's request, the defendant will do the following:

1. Ms. Ying will leave on February 20, 2025 to travel by plane to Boston, Massachusetts, and will return to her home on February 25, 2025.
2. Prior to traveling outside the Southern District of Florida, Ms. Ying agrees to identify the mode of transportation to and from the destinations listed to her assigned probation officer (if by airplane Ms. Ying will provide airline, flight number, departure, and arrival times).
3. Upon returning to the Southern District of Florida, Ms. Ying will telephone her probation officer and indicate that she has returned.
4. Ms. Ying communicated her request to United States Pretrial Services Officer Nelson Valenzuela from the Southern District of Florida, who indicated that Probation has "[n]o objections to this travel so long as [Ms. Ying] provides a travel itinerary and secures a court order."

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5. United States Attorney Steven Kochevar indicated that the government does not object to the requested modification.

WHEREFORE, the defendant moves that the Court issue an Order permitting the defendant to travel with the advanced notification and approval of her United States Probation Officer, to visit Hyde Park, Massachusetts on the dates listed above, subject to the conditions imposed by her probation officer.

Respectfully Submitted

THE DEFENDANT,
Justine Ying

By: /s/ Bruce D. Koffsky

BDK/dgb

cc: AUSA Steven J. Kochevar via email

APPLICATION GRANTED, subject to the specific requirements set forth above, including providing a complete travel itinerary to the appropriate Pretrial Services Officer, and notifying the appropriate officer upon her return from travel.

Dated: January 28, 2025

SO ORDERED.



ANDREW E. KRAUSE
United States Magistrate Judge